

RECEIVED

22 August, 2007

AUG 23 2007

California Regional Water Quality Control Board
Central Valley Region
Fresno Branch Office
1685 E Street
Fresno, CA 93706

RWQCB-CVR
FRESNO, CALIF.

Re: Comments and Recommendations Regarding 'Tentative Waste Discharge Requirements For Pacific US Real Estate Group, Silvertip Resort Village, Wastewater Treatment Facility, Mariposa County.'

The Yosemite Alpine Village Association request the California Regional Water Quality Control Board to disapprove the application as applied for as the Antidegradation Section of the proposed permit is the incomplete and inadequate. An alternative exists which will concurrently protect the watershed and drinking source water quality while concurrently allowing the developer, Pacific US, to construct and operate the proposed project without modification. By this alternative, the intent of the Antidegradation Policy of the California Regional Water Quality Control Board will also be fully attained. The alternative is to disapprove the permit, as proposed, and to disallow any spray field, irrigation, or leach field application of treated waste onto the watershed of the proposed project. Instead, we request the California Regional Water Quality Control Board to encourage the developer to return with a plan for discharge into Big Creek with an application for a National Pollutant Discharge Elimination System (NPDES) Permit.

As background, the Yosemite Alpine Community Service District, the water purveyor to the Yosemite Alpine Village Association operates two wells, their sole water source, in close proximity to the proposed leach field area and spray fields. It is important to note that no other source water is relatively available for the Community Service District. These wells produce water of exceptionally high quality and are not treated in anyway prior to delivery. During the EIR process, water experts and with this proposed permit process, your own staff have concluded and stated that the sole drinking water source of the YACSD will become contaminated (degraded) if the proposed spray fields and leach fields are permitted and operated. Your staff report even acknowledges that certain some substances will not be eliminated with the current technology or proposed treatment system. The publications and web sites of the USGS Toxic Substances Hydrology Program, Federal EPA, and Cal EPA all concur and present significant information on 'Emerging Contaminants' and that this information should be considered as part of source water protection. The proposed project area (watershed area) containing the Yosemite Alpine Community Service District wells and proposed spray fields and leach fields does not have any type of clay or other barrier that would prevent the mixing of all waste waters with drinking source waters. Furthermore, during the proposed operating periods of the leach fields, the water table is often at the ground surface, assuring the mixing of waste and drinking source waters.

Discharge of treated waste into Big Creek under NPDES requirements will avoid any potential for the drinking source water for the Yosemite Alpine Community Service District from becoming contaminated. As precedent, the California Regional Water Quality Control Board has already approved the discharge of treated waste into Big Creek from the Wawona Waste Water Treatment Facility (Order No. R5-2005-0155, NPDES NO. CA0081795) located only a few miles downstream from Fish Camp. Furthermore, the Madera Irrigation District has significant water rights and a diversion on Big Creek just above Fish Camp, so any discharge into Big Creek will be well within historical natural flows.

Referencing Governor Schwarzenegger's Agenda to Bring Back California, the residents of Yosemite Alpine Village Association request the California Regional Water Quality Control Board to consider:

"California's economic future depends significantly on the quality of our environment. We face serious environmental challenges, which have profound impact on public health and the economy. "Jobs vs. the environment" is a false choice. Overwhelming evidence demonstrates that clean air and water result in a more productive workforce, and a healthier economy, which will contribute to a balanced state budget. Moreover, it is the children who suffer disproportionate impacts of environmental toxins. ... This administration will protect and restore California's air, water and landscapes so that all the people of California can enjoy the natural beauty that is California."

The residents, children, and grandchildren of the Yosemite Alpine Village Association should have the right to continued extremely high quality drinking water, and by the California Regional Water Quality Control Board's actions, as requested above, can, without altering the proposed project in any way.

Yours Truly,



Eugene Glendenning, President
Yosemite Alpine Village Association

Cell (559) 301-8718
Eugene.Glendenning@GTE.Net